



5. Plaintiff and Defendants agree to this Motion.

6. The parties do not anticipate the need for an additional extension of time to complete fact discovery.

7. The parties have attached a proposed Order.

WHEREFORE, Plaintiff and Defendants respectfully request this Honorable Court grant the requested extension to complete discovery and extend the current Case Management deadlines by sixty days.

Respectfully submitted,  
Lavery Law

DATE: December 29, 2023

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DATE: December 29, 2023

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